

**EXHIBIT 2**

**DECLARATION OF JEFFREY JACKSON  
IN SUPPORT OF DEFENDANTS'  
RESPONSE IN OPPOSITION TO MOTION**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

DILLON MYRICK,

*Plaintiff,*

v.

ADAPTHEALTH LLC; HOME MEDICAL  
EXPRESS, INC.,

*Defendants.*

Case No. 6:22-cv-484-JDK

Hon. Jeremy D. Kernodle

**DECLARATION OF JEFFREY JACKSON**

I, Jeffrey Jackson, declare as follows:

1. I am a citizen of the United States, and I am over 21 years of age. I am employed by AdaptHealth LLC (“AdaptHealth”) in the role of Vice President, Applications. I have personal knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.


2. As part of my duties for AdaptHealth, I am familiar with the identity and method of preparation of AdaptHealth’s related business records. In particular, I am familiar with the SNAP database of patient records.

3. I created two sets of data that were produced in this case. The first set of data are the “Do-Not-Call List” files. The file that has been produced as ADAPT\_0000097 contained a list of every account in SNAP that had an inactive disposition of “On Do Not Call List.” The files that have been produced as ADAPT\_0000219 and ADAPT\_0000227 contain a list of every account in SNAP with an inactive disposition of “Legacy On Do Not Call List [DO NOT USE]” or “Patient requested,” or that has the attribute of “PATIENTDONOTCALLFORSALES.”

4. The second set of data were the "Analysis Files." These were produced in this litigation as ADAPT\_0000218 and ADAPT\_0000228. ADAPT\_0000228 was created by searching the SNAP system for any patient whose account records include any phone number on ADAPT\_0000227, other than the patients already reflected on ADAPT\_0000227. This is not necessarily a complete listing of all patients whose account records include any phone number on ADAPT\_0000227. In other words, ADAPT\_0000228 is not a list of accounts that reflect a do-not-call request; it is a list of accounts that share a telephone number with an account that reflects a do-not-call request. Due to limitations in the SNAP database, some accounts may have at one time shared a telephone number with an account on ADAPT\_0000227 but were not located and included in ADAPT\_0000228.

I declare under penalty of perjury that the foregoing is true and correct. Executed on Nov, 21, 2024.

By:

  
Jeffrey Jackson